

## **EXHIBIT B**

Initial REMS approval: 06/2011

Most recent modification: 03/2016

NDA 020687 MIFEPREX<sup>®</sup> (mifepristone) Tablets, 200 mg

Antiprogestational Synthetic Steroid

Danco Laboratories, LLC  
PO Box 4816  
New York, NY 10185

## **RISK EVALUATION AND MITIGATION STRATEGY (REMS)**

### **I. GOAL**

The goal of the Mifeprex REMS is to mitigate the risk of serious complications associated with Mifeprex by:

- a) Requiring healthcare providers who prescribe Mifeprex to be certified in the Mifeprex REMS Program.
- b) Ensuring that Mifeprex is only dispensed in certain healthcare settings by or under the supervision of a certified prescriber.
- c) Informing patients about the risk of serious complications associated with Mifeprex

### **II. REMS ELEMENTS**

#### **A. Elements to Assure Safe Use**

1. Healthcare providers who prescribe Mifeprex must be specially certified.
  - a. To become specially certified to prescribe Mifeprex, healthcare providers must:
    - i. Review the Prescribing Information for Mifeprex.
    - ii. Complete the *Prescriber Agreement Form*. By signing the *Prescriber Agreement Form*, prescribers agree that:
      - 1) They have the following qualifications:
        - a) Ability to assess the duration of pregnancy accurately

- b) Ability to diagnose ectopic pregnancies
- c) Ability to provide surgical intervention in cases of incomplete abortion or severe bleeding, or to have made plans to provide such care through others, and ability to assure patient access to medical facilities equipped to provide blood transfusions and resuscitation, if necessary.

2) They will follow the guidelines for use of Mifeprex (see b.i-v below).

b. As a condition of certification, healthcare providers must follow the guidelines for use of Mifeprex described below:

- i. Review the *Patient Agreement Form* with the patient and fully explain the risks of the Mifeprex treatment regimen. Answer any questions the patient may have prior to receiving Mifeprex.
- ii. Sign the *Patient Agreement Form* and obtain the Patient's signature on the *Form*
- iii. Provide the patient with a copy of the *Patient Agreement Form* and Medication Guide.
- iv. Place the signed *Patient Agreement Form* in the patient's medical record.
- v. Record the serial number from each package of Mifeprex in each patient's record.
- vi. Report any deaths to Danco Laboratories, identifying the patient by a non-identifiable reference and the serial number from each package of Mifeprex.

c. Danco Laboratories must:

- i. Ensure that healthcare providers who prescribe Mifeprex are specially certified in accordance with the requirements described above and de-certify healthcare providers who do not maintain compliance with certification requirements
- ii. Provide the Prescribing Information and *Prescriber Agreement Form* to healthcare providers who inquire about how to become certified.

The following materials are part of the REMS and are appended:

- *Prescriber Agreement Form*
- *Patient Agreement Form*

2. Mifeprex must be dispensed to patients only in certain healthcare settings, specifically clinics, medical offices, and hospitals, by or under the supervision of a certified prescriber.

a. Danco Laboratories must:

- i. Ensure that Mifeprex is available to be dispensed to patients only in clinics, medical offices and hospitals by or under the supervision of a certified prescriber.

- ii. Ensure that Mifeprex is not distributed to or dispensed through retail pharmacies or other settings not described above.
- 3. Mifeprex must be dispensed to patients with evidence or other documentation of safe use conditions.
  - a. The patient must sign a *Patient Agreement Form* indicating that she has:
    - i. Received, read and been provided a copy of the *Patient Agreement Form*.
    - ii. Received counseling from the prescriber regarding the risk of serious complications associated with Mifeprex.

## **B. Implementation System**

- 1. Danco Laboratories must ensure that Mifeprex is only distributed to clinics, medical offices and hospitals by or under the supervision of a certified prescriber by:
  - a. Ensuring that distributors who distribute Mifeprex comply with the program requirements for distributors. The distributors must:
    - i. Put processes and procedures in place to:
      - a. Complete the healthcare provider certification process upon receipt of the *Prescriber Agreement Form*.
      - b. Notify healthcare providers when they have been certified by the Mifeprex REMS Program.
      - c. Ship Mifeprex only to clinics, medical offices, and hospitals identified by certified prescribers in the signed *Prescriber Agreement Form*.
      - d. Not ship Mifeprex to prescribers who become de-certified from the Mifeprex Program.
      - e. Provide the Prescribing Information and *Prescriber Agreement Form* to healthcare providers who (1) attempt to order Mifeprex and are not yet certified, or (2) inquire about how to become certified.
    - ii. Put processes and procedures in place to maintain a distribution system that is secure, confidential and follows all processes and procedures, including those for storage, handling, shipping, tracking package serial numbers, proof of delivery and controlled returns of Mifeprex.
    - iii. Train all relevant staff on the Mifeprex REMS Program requirements.
    - iv. Comply with audits by Danco Laboratories, FDA or a third party acting on behalf of Danco Laboratories or FDA to ensure that all processes and procedures are in place and are being followed for the Mifeprex REMS Program. In addition, distributors must maintain appropriate documentation and make it available for audits.
  - b. Ensuring that distributors maintain secure and confidential distribution records of all shipments of Mifeprex.

2. Danco Laboratories must monitor distribution data to ensure compliance with the REMS Program.
3. Danco Laboratories must audit new distributors within 90 calendar days after the distributor is authorized to ensure that all processes and procedures are in place and functioning to support the requirements of the Mifeprex REMS Program. Danco Laboratories will take steps to address distributor compliance if noncompliance is identified.
4. Danco Laboratories must take reasonable steps to improve implementation of and compliance with the requirements of the Mifeprex REMS Program based on monitoring and assessment of the Mifeprex REMS Program.
5. Danco Laboratories must report to FDA any death associated with Mifeprex whether or not considered drug-related, as soon as possible but no later than 15 calendar days from the initial receipt of the information by the applicant. This requirement does not affect the applicant's other reporting and follow-up requirements under FDA regulations.

#### **C. Timetable for Submission of Assessments**

Danco Laboratories must submit REMS assessments to FDA one year from the date of the initial approval of the REMS (06/08/2011) and every three years thereafter. To facilitate inclusion of as much information as possible while allowing reasonable time to prepare the submission, the reporting interval covered by each assessment should conclude no earlier than 60 days before the submission date for that assessment. Danco Laboratories must submit each assessment so that it will be received by the FDA on or before the due date.

## PRESCRIBER AGREEMENT FORM

*Mifeprex*<sup>®</sup> (Mifepristone)  
Tablets, 200 mg

Mifeprex\* (Mifepristone) Tablets, 200 mg, is indicated, in a regimen with misoprostol, for the medical termination of intrauterine pregnancy through 70 days gestation. Please see Prescribing Information and Medication Guide for complete safety information.

*To set up your account to receive Mifeprex, you must:*

1. complete, 2. sign, and 3. fax page 2 of this form to the distributor.

If you will be ordering for more than one facility, you will need to list each facility on your order form before the first order will be shipped to the facility.

**Prescriber Agreement:** By signing page 2 of this form, you agree that you meet the qualifications below and will follow the guidelines for use. You also understand that if you do not follow the guidelines, the distributor may stop shipping Mifeprex to you.

*Mifeprex must be provided by or under the supervision of a healthcare provider who prescribes and meets the following qualifications:*

- Ability to assess the duration of pregnancy accurately.
- Ability to diagnose ectopic pregnancies.
- Ability to provide surgical intervention in cases of incomplete abortion or severe bleeding, or to have made plans to provide such care through others, and ability to assure patient access to medical facilities equipped to provide blood transfusions and resuscitation, if necessary.
- Has read and understood the Prescribing Information of Mifeprex. The Prescribing Information is available by calling our toll free number, 1-877-4 Early Option (1-877-432-7596), or logging on to our website, [www.earlyoptionpill.com](http://www.earlyoptionpill.com).

*In addition to meeting these qualifications, you also agree to follow these guidelines for use:*

- Review the Patient Agreement Form with the patient and fully explain the risks of the Mifeprex treatment regimen. Answer any questions the patient may have prior to receiving Mifeprex.
- Sign and obtain the patient's signature on the Patient Agreement Form.
- Provide the patient with a copy of the Patient Agreement Form and the Medication Guide.
- Place the signed Patient Agreement Form in the patient's medical record.
- Record the serial number from each package of Mifeprex in each patient's record.
- Report deaths to Danco Laboratories, identifying the patient by a non-identifiable patient reference and the serial number from each package of Mifeprex.



Danco Laboratories, LLC • P.O. Box 4816 • New York, NY 10185  
1-877-4 Early Option (1-877-432-7596) • [www.earlyoptionpill.com](http://www.earlyoptionpill.com)

\*MIFEPRX is a registered trademark of Danco Laboratories, LLC.

03/2016

**TO SET UP YOUR ACCOUNT:****1**

Read the  
Prescriber Agreement on  
page 1 of this form.

**2**

Complete and  
sign this form.

**3**

Fax this page to the  
Danco distributor at  
1-866-227-3343.  
Your account  
information will be kept  
strictly confidential.

**4**

The distributor will call  
to finalize your account  
setup and take your  
initial order.

**5**

Subsequent orders may  
be phoned or faxed and  
are usually shipped  
within 24 hours.

**ACCOUNT SETUP** MIFEPREX® (Mifepristone) Tablets, 200 mg; NDC 64875-001-01**BILLING INFORMATION**

Bill to Name \_\_\_\_\_  
Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_  
Phone \_\_\_\_\_ Fax \_\_\_\_\_  
Attention \_\_\_\_\_

**SHIPPING INFORMATION** ☐ *Check if same as above*

Ship to Name \_\_\_\_\_  
Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_  
Phone \_\_\_\_\_ Fax \_\_\_\_\_  
Attention \_\_\_\_\_

**ADDITIONAL SITE LOCATIONS** *I will also be prescribing Mifeprex\* at these additional locations:*

Name \_\_\_\_\_ Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_  
Phone \_\_\_\_\_ Fax \_\_\_\_\_

Name \_\_\_\_\_ Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_  
Phone \_\_\_\_\_ Fax \_\_\_\_\_

*(Any additional sites may be listed on an attached sheet of paper.)*

**REQUEST ADDITIONAL MATERIALS**

☐ Medication Guides ☐ State Abortion Guides ☐ Patient Brochures ☐ Patient Agreement Form

**ESTABLISHING YOUR ACCOUNT** *(required only with first order)*

Each facility purchasing Mifeprex must be included on this form *(see additional site locations box above)* before the distributor can ship the product to the facility.

**By signing below, you agree that you meet the qualifications and that you will follow the guidelines for use on page 1 of the Prescriber Agreement.**

Print Name \_\_\_\_\_ Signature \_\_\_\_\_

Medical License # \_\_\_\_\_ Date \_\_\_\_\_

**FAX THIS COMPLETED FORM TO THE AUTHORIZED DISTRIBUTOR. FAX: 1-866-227-3343**

Please fax any questions to the above number or call 1-800-848-6142.

\*MIFEPREX is a registered trademark of Danco Laboratories, LLC.



## PATIENT AGREEMENT FORM

*Mifeprex*<sup>®</sup> (Mifepristone)  
Tablets, 200 mg

**Healthcare Providers:** *Counsel the patient on the risks of Mifeprex\*. Both you and the patient must sign this form.*

**Patient Agreement:**

1. I have decided to take Mifeprex and misoprostol to end my pregnancy and will follow my provider's advice about when to take each drug and what to do in an emergency.
2. I understand:
  - a. I will take Mifeprex on Day 1.
  - b. My provider will either give me or prescribe for me the misoprostol tablets which I will take 24 to 48 hours after I take Mifeprex.
3. My healthcare provider has talked with me about the risks including:
  - heavy bleeding
  - infection
  - ectopic pregnancy (a pregnancy outside the womb)
4. I will contact the clinic/office right away if in the days after treatment I have:
  - a fever of 100.4°F or higher that lasts for more than four hours
  - severe stomach area (abdominal) pain
  - heavy bleeding (soaking through two thick full-size sanitary pads per hour for two hours in a row)
  - stomach pain or discomfort, or I am "feeling sick", including weakness, nausea, vomiting, or diarrhea, more than 24 hours after taking misoprostol
5. My healthcare provider has told me that these symptoms could require emergency care. If I cannot reach the clinic or office right away my healthcare provider has told me who to call and what to do.
6. I should follow up with my healthcare provider about 7 to 14 days after I take Mifeprex to be sure that my pregnancy has ended and that I am well.
7. I know that, in some cases, the treatment will not work. This happens in about 2 to 7 out of 100 women who use this treatment. If my pregnancy continues after treatment with Mifeprex and misoprostol, I will talk with my provider about a surgical procedure to end my pregnancy.
8. If I need a surgical procedure because the medicines did not end my pregnancy or to stop heavy bleeding, my healthcare provider has told me whether they will do the procedure or refer me to another healthcare provider who will.
9. I have the MEDICATION GUIDE for Mifeprex. I will take it with me if I visit an emergency room or a healthcare provider who did not give me Mifeprex so that they will understand that I am having a medical abortion with Mifeprex.
10. My healthcare provider has answered all my questions.

**Patient Signature:** \_\_\_\_\_ **Patient Name (print):** \_\_\_\_\_ **Date:** \_\_\_\_\_

*The patient signed the PATIENT AGREEMENT in my presence after I counseled her and answered all her questions. I have given her the MEDICATION GUIDE for Mifeprex.*

**Provider's Signature:** \_\_\_\_\_ **Name of Provider (print):** \_\_\_\_\_ **Date:** \_\_\_\_\_

*After the patient and the provider sign this PATIENT AGREEMENT, give 1 copy to the patient before she leaves the office and put 1 copy in her medical record.*



-----  
**This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.**  
-----

/s/  
-----

(b) (6)

03/29/2016